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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 OAKLAND DIVISION

10 UNITED STATES OF AMERICA,)	No. CR-12-00600 YGR
)	
11 Plaintiff,)	STIPULATED REQUEST TO CONTINUE
)	HEARING DATE TO JANUARY 31, 2013
12 v.)	AND TO EXCLUDE TIME UNDER THE
)	SPEEDY TRIAL ACT AND ORDER
13)	
14 DERON MATUKOL WILLIAMS)	Hearing Date: December 20, 2012
)	Time: 2:00 p.m.
15)	
16 Defendants.)	
)	
)	

17
18 The above-captioned matter is set on December 20, 2012 before this Court for a status
19 hearing. The parties jointly request that the Court continue the matter to January 31, 2013, and
20 that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161, between December
21 20, 2012 and January 31, 2013, so that the defense can complete its review of the discovery,
22 investigate the case and to calculate the sentencing Guidelines.

23 On August 2, 2012, the Grand Jury charged Deron Williams with one count of bank
24 robbery and ten counts of armed bank robbery, violations of Title 18, United States Code,
25 Sections 2113 (a) and (d). On the most serious charges, Mr. Williams faces a maximum of 20 to
26 25 years imprisonment on each count. Mr. Williams had private counsel until late September

1 2012 at which point the Federal Public Defender was appointed to represent Mr. Williams.

2 The government has produced extensive discovery in this case, including approximately
3 one thousand pages of records, videos, photographs and complex DNA reports. The government
4 continues to produce discovery as it is received. For example, on November 15, 2012, the
5 government produced two CD-roms that contain analysis from a computer seized in this case.
6 The defense needs additional time to assess this new discovery. Additionally, the defense would
7 like additional time to assess the DNA evidence produced in this case and the findings from the
8 government lab.

9 The defense continues to review this discovery but also needs more time to investigate
10 the 10 robberies charged in the Indictment. The defense also needs to conduct an evidence view
11 and needs more time to collect records to research Mr. Williams' anticipated Sentencing
12 Guidelines range. For these reasons, the defense requests additional time to review the discovery
13 and to continue the defense investigation.

14 The parties stipulate and agree that the ends of justice served by this continuance
15 outweigh the best interest of the public and the defendant in a speedy trial. The parties further
16 agree that the failure to grant this continuance would unreasonably deny counsel for defendant
17 the reasonable time necessary for effective preparation, taking into account the exercise of due
18 diligence. Accordingly, the parties agree that the period of time from December 20, 2012 until
19 January 31, 2013, should be excluded in accordance with the provisions of the Speedy Trial Act,
20 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking into
21 account the exercise of due diligence.

22 DATED: December 17, 2012

_____/S/
JAMES C. MANN
Assistant United States Attorney

25 DATED: December 17, 2012

_____/S/
ANGELA M. HANSEN
Assistant Federal Public Defender

1 **ORDER**

2 Based on the reasons provided in the stipulation of the parties above, the Court hereby
3 FINDS:

4 1. Given that the government has produced discovery to defendant that includes
5 voluminous records, video files, DNA discovery and computer forensics that the defense needs
6 to review, and given that the government continues to produce discovery as it is received;

7 2. Given the defense need to complete its investigation of the ten bank robberies
8 charged in this case;

9 3. Given the defense need to collect records and to research the Sentencing
10 Guidelines range;

11 4. Given that these above-listed tasks are necessary to the defense preparation of the
12 case and that the failure to grant the requested continuance would unreasonably deny counsel for
13 defendant the reasonable time necessary for effective preparation, taking into account the
14 exercise of due diligence;

15 5. Given that the ends of justice served by this continuance outweigh the best
16 interest of the public and the defendant in a speedy trial;

17 Based on these findings, IT IS HEREBY ORDERED that the status date of December 20,
18 2012 is vacated and reset for January 31, 2013, at 2:00 p.m. It is FURTHER ORDERED that
19 time is excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), from
20 December 20, 2012 until January 31, 2013.

21
22 December 19, 2012


YVONNE GONZALEZ ROGERS
United States District Judge